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January 21, 2015

Hon. Lorna G. Schofield, U.S.D.J.
Southern District of New York

re: 10-CV-3959 *Kriss v. Bayrock*

**REQUEST FOR AN ENLARGEMENT OF TIME
TO FILE OBJECTIONS TO R&R**

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Dear Judge Schofield:

Pursuant to the January 14, 2015 Report and Recommendation of Magistrate Frank Maas¹, we, the undersigned counsels for plaintiffs, request enlargement of time to file objections to that R&R, to be now made due on February 18, 2015 instead of January 28, 2015, for the following reasons:

1. In the related matter of *E/O Gottdiener v. Sater*, 14-1313, (CA2), our reply brief is due February 2nd. Recognizing that Appellee's brief is quite lengthy and the reply will require great efforts over the next ten days by multiple firms, the Second Circuit has enlarged time to reply to that date, so we can't request further time from that court.
2. Similarly, it will take much time to prepare our objections. While we won't go over limit, it will take time to explain why the recommendation is incorrect because the magistrate misapprehended the correctness of the production of information for 600 allegations. And we need time to coordinate with our First Amendment and ethics counsels in re issues to be addressed in the objections as well as related proceedings.
3. Finally, we are in the middle of court-ordered depositions in a state court matter and cannot change those dates

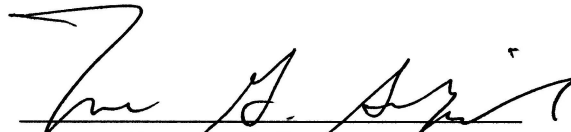
Accordingly, good cause shown, we most respectfully request this enlargement of time. Opposing counsel Mr. Saurack of Bayrock has advised us that he does not object to our request. Other opposing counsel has not yet replied back but took no part in the magistrate proceedings.

Respectfully submitted,

/s/ Frederick M. Oberlander, Counsel of Record
/s/ Richard E. Lerner, Co-Counsel

Application GRANTED. Any objections to Judge Maas' Report and Recommendation shall be filed no later than February 18, 2015. No further extensions will be granted absent a showing of extraordinary circumstances.

Dated: January 22, 2015
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE